

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of:)	
)	
)	
Universal Service Contribution)	WC Docket No. 06-122
Methodology)	

To: The Commission

COMMENTS OF ONSTAR CORPORATION

OnStar Corporation (“OnStar”) respectfully submits these Comments in response to the Commission’s Notice of Proposed Rulemaking (“NPRM”) in this proceeding.

In addition to its core call center-based telematics service, OnStar offers an optional prepaid, interconnected wireless calling service to most of its subscribers. In offering this service, OnStar acts as a reseller of airtime purchased on a wholesale basis from its wireless carrier partners. OnStar reports revenues from this service and remits USF contribution

payments using the wireless safe-harbor reporting and remitting option provided under the Commission's rules.

OnStar urges the Commission to retain a wireless safe harbor reporting and remitting option. As a relatively small provider of interconnected wireless calling service, OnStar believes the safe harbor methodology offers a cost-effective option compared to the expense and complexity of conducting traffic studies. As a reseller, without immediate access to network data, this complexity is magnified.

OnStar appreciates consideration of its views in this matter.

Respectfully submitted,

/s/ Ari Q. Fitzgerald

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